



DEC 10 1987

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Director
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Trenton, N.J. 08625
609 - 633 - 1408

Mark Matthews
Vice President
Plasti-Clad Metal Products, Inc.
P.O. Box 121
Manasquan, N.J. 08636-0121

Dear Mr. Matthews:

RE: Closure Plan Approval, Plasti-Clad Metal Products, Inc., Wall,
NJ 011 417 516, CP 86-51

The New Jersey Department of Environmental Protection (the Department) is in receipt of Plasti-Clad's Closure Plan dated December 30, 1987, Short Term Tank Storage Permitting Exemption Request dated January 1987, and the additions to these plans dated April 10, 1987 and October 23, 1987. The Department has reviewed the aforementioned submittals and hereby approves closure of Plasti-Clad's four (4) hazardous waste storage tanks and less than 90 day accumulation of hazardous waste in the 6,000 gallon and two (2)-990 gallon tanks.

Closure activities shall take place in accordance with the December 30, 1986 Closure Plan, the April 10, 1987 additions, the requirements set forth in N.J.A.C. 7:26-9.8., and the following conditions:

1. All hazardous waste contained in the 6,000 gallon fiberglass reinforced plastic tank, the 3,000 gallon polypropylene tank, and the two (2) - 990 gallon fiberglass reinforced plastic tanks shall be removed for manifested disposal to an authorized hazardous waste facility within ninety (90) days from the date of this approval. Thereafter, hazardous waste shall not be stored in the 3,000 gallon tank, and hazardous waste shall not be accumulated in the 6,000 gallon and two (2) - 990 gallon tank for more than ninety (90) days.
2. The 3,000 gallon polypropylene tank shall be decontaminated in accordance with Section 4.2 of the December 30, 1986 Closure Plan. That is, the tank shall be rinsed completely three times with water to remove all sludges and waste residues. A sample of rinsate from the third rinse shall be analyzed for hexavalent chromium and pH. The procedures shall be repeated until rinsate from the tank is considered non-hazardous.

3. All hazardous waste containment structures shall be decontaminated in accordance with the following procedures:
 - a. All free liquid and absorbent in the containment areas shall be drummed and sent off-site to an authorized facility.
 - b. The containment areas shall be scrubbed with a stiff bristle brush or a wire brush and a water/biodegradable liquid organic cleaner. Scrubbing shall proceed until all staining and discoloration of the structures has been removed. If stains cannot be removed by the above method, the facility shall notify the Department and propose an alternative method of decontamination.
 - c. The containment areas shall be rinsed with clean tap water.
 - d. The rinsate shall be removed from the containment areas and drummed for off-site disposal at an authorized facility.
4. Plasti-Clad shall complete closure activities within 180 days from the date of this approval.
5. Written certification by an independent, registered professional engineer shall be provided within 210 days from the date of this approval. This certification shall document that all closure procedures have been carried out in accordance with the approved closure plan.

A complete delisting of the facility can only occur after the closure certification has been received and approved by the Department.

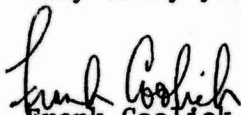
Approval for less than 90 day accumulation of hazardous waste in the 6,000 gallon and the two (2)-990 gallon fiberglass reinforced plastic (FRP) tanks is conditional upon the following:

1. Each tank shall have sufficient strength to ensure that the tank will not collapse or rupture. Since the tanks are constructed of plastic, specifying a minimum shell thickness is impractical. Therefore, to ensure the integrity of the tanks, Plasti-Clad shall perform daily inspection to detect ruptures, cracks, or any other deterioration of the tank and shall perform any repairs necessary to prevent the release of hazardous waste;
2. Each tank shall be equipped with controls to prevent overfilling in accordance with N.J.A.C. 7:26-10.5(c). Specifically, the 6,000 gallon tank shall be equipped with a high level alarm system, and the level of the two (2)-990 gallon tanks shall be checked visually each time the contents of a drum is to be emptied into one of the tanks;
3. Each tank or tank storage area shall have adequate secondary containment in accordance with N.J.A.C. 7:26-10.5(d);

4. Each tank shall be designed so that at least 99 percent of the volume of each tank can be readily emptied by direct pumping or drainage;
5. Each tank is rendered empty, as defined at N.J.A.C. 7:26-1.4, every 90 days or less;
6. All waste removed from the tanks shall be shipped off-site to an authorized facility or placed in an on-site, authorized facility, as defined at N.J.A.C. 7:26-1.4;
7. Plasti-Clad shall comply with the requirements for owners or operators of hazardous waste facilities under N.J.A.C. 7:26-9.4(g) concerning personnel training, and under N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures; and
8. No part of the tanks are below grade.

If you have any questions on this matter, please contact Michael Gerchman of my staff (609) 292-9880.

Very truly yours,



Frank Coolick, Assistant Director
Hazardous Waste Regulation Element

EP62/lr

cc: Barry Tornick, USEPA